

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: : Chapter 13
:
DAVID O. MARSHALL, SR., : Case No. **17-22229-GLT**
:
Debtor, : Related to Doc. Nos. 100 & 101
===== :
VISIO FINANCIAL SERVICES, INC., : Hearing Date: 3/10/2021 at
:
10:00 a.m.
Movant, :
:
vs. :
DAVID O. MARSHALL, SR., :
:
Respondent, :

DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM
STAY OF VISIO FINANCIAL SERVICES, INC.

AND NOW comes the Debtor, DAVID O. MARSHALL, SR., by and through the Debtor's Attorney, MICHAEL S. GEISLER, ESQUIRE, and files this Response, of which the following is a statement:

1. Paragraphs 1 through 12 of the Movant's Motion are admitted.
2. Paragraph 13 of the Movant's Motion is denied. The Movant has no cause to have the automatic stay terminated. The Movant is adequately protected by a Chapter 13 Plan and an equity cushion. The Debtor can repay the advances made by Movant through an Amended Plan.
3. Paragraph 14 of the Movant's Motion are requires no response.

WHEREFORE, the Debtor prays that this Court deny the Movant's Motion for Relief from Stay.

/s/ Michael S. Geisler

DATED: 2/11/2021

MICHAEL S. GEISLER, ESQUIRE
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CERTIFICATE OF SERVICE

I, MICHAEL S. GEISLER, ESQUIRE, Attorney for the Debtor, hereby certify that I have served a true and correct copy of the within Response upon the following by electronic means:

RONDA J. WINNECOUR, TRUSTEE
3250 U.S. Steel Tower
600 Grant Street
Pittsburgh, PA 15219

BRIAN NICHOLAS, ESQUIRE
KML Law Group, P.C.
701 Market Street
Suite 5000
Philadelphia, PA 19106

/s/ Michael S. Geisler

DATED: 2/11/2021

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